



Docket No. 01-0662
Mark J. Cottrell Phase 2 Rebuttal Affidavit
Schedule MJC-1

MPSC Case No. U-12320

Draft Compliance Plan

For

Customer Service Inquiry Accuracy

February 13, 2003

Draft CSI Accuracy Compliance Plan

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1. Purpose

The purpose of this revised draft compliance plan is to describe the actions Michigan Bell Telephone Company (“SBC”) proposes to take to improve certain aspects of Customer Service Inquiry (“CSI”) accuracy. SBC originally proposed a CSI compliance plan on October 30, 2002 (“October 30 Compliance Filing”). As directed by the Michigan Public Service Commission’s (“MPSC’s”) Order issued on January 13, 2003 (“January 13 Order”), in Case No. U-12320, this draft has been revised to further address the operational concerns with CSI accuracy identified in BearingPoint’s Report, and those discussed in the technical workshop and submitted in written comments. SBC recognizes that further modifications to this plan may be appropriate based on the collaborative session scheduled for March 4 – 5, 2003. As a result, SBC will submit a modified compliance plan to the MPSC by March 13, 2003. Subject to any further direction from the MPSC, SBC intends to retain BearingPoint to evaluate SBC’s implementation of the final compliance plan.

2. Issue Definition

BearingPoint (f/k/a KPMG Consulting) first raised this issue in Exception 33 as part of the Third Party Operations Support Systems (“OSS”) testing on January 28, 2002 stating that they have observed instances where SBC has failed to accurately update the Customer Service Inquiry (“CSI”) records. In this test, information contained within the CSR extract returned by a Customer Service Inquiry was evaluated for accuracy against field inputs from submitted Test CLEC orders, i.e., Local Service Requests (“LSRs”). In the course of evaluating this issue, BearingPoint retested CSI accuracy three times over a nine-month period. On October 24, 2002, SBC requested that no further retesting be performed, and a final disposition report was issued on November 14, 2002. BearingPoint’s October 30, 2002 OSS Test Report found that test criteria for TVV-27 was “not satisfied.”

In response to BearingPoint’s evaluation, SBC implemented system modifications and process improvements that improved tested performance from 88% to 92%; the MPSC found the difference between 92% and the 95% benchmark selected by BearingPoint was not indicative of discriminatory behavior¹. SBC believes that the remaining errors identified in the OSS test are either immaterial in terms of billing or provisioning, or are associated with product ordering scenarios not widely seen in the commercial environment.

3. Root Cause Analysis

The process for updating a customer service record (“CSR”) begins when a CLEC submits a local service request (“LSR”) to migrate, install, convert, change or disconnect

¹ MPSC Report, January 13, 2003, pg. 67 – “[T]he Commission does not believe that the amount by which the benchmark has been missed is of a level of significance to indicate discriminatory behavior on the part of SBC and failure of an opportunity to provide CLECs a reasonable opportunity to compete.”

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network elements or services. When provisioning work is completed, SBC creates and stores an updated CSR in the SBC Midwest Customer Information System (“ACIS”). A CLEC may obtain access to a CSR by issuing a customer service inquiry (“CSI”) using Verigate, EDI or CORBA interfaces.

In its analysis of the results provided by the BearingPoint test, SBC determined that the primary cause of CSI inaccuracies was errors on manually-handled Resale and UNE-P service orders. In these situations, the data on the CLEC-submitted LSR was not accurately input on the internal service order by the SBC service representative. Any inaccuracy on the service order is then reflected in the ACIS CSR database when the database is updated upon order completion.

These manually-handled service orders are generally associated with the ordering of complex products. CSIs for other products were successfully tested by BearingPoint and, thus, do not need to be addressed in this compliance plan.²

4. Actions

The compliance plan for CSI Accuracy proposed by SBC in its October 30 Compliance Filing was constructed to address the reliability and accuracy of manual service orders. The plan included the development and delivery of a quality awareness training package to the hundreds of SBC service representatives that handle CLEC service orders. Additionally, it called for the implementation of a service order quality review process consisting of reviews of daily production service orders, corrections of identified errors, and coaching and/or process/system improvements based on data gathered from the review process.

The MPSC in its January 13 Order indicated that the CSI Accuracy compliance plan should be expanded, to the extent possible, to address the specific comments of AT&T. In reference to the CSI Accuracy compliance plan, AT&T made recommendations regarding the content of the service representative training package, the period of the training, the scope of the quality improvement effort, a commitment by SBC to fix errors identified as part of its quality review, and the potential need for a performance measure of CSI Accuracy.³ SBC has addressed the requirements of the MPSC and responded to the comments of AT&T in the following enhanced plan.

SBC is taking the following steps to improve the accuracy of CSI:

² AT&T questioned why more products were not included in this compliance plan in its 11/15/02 comments; see Connolly affidavit, pp. 20 & 22; ¶¶ 45 & 50.

³ See AT&T’s comments filed 11/15/02, Connolly affidavit at pg. 23, ¶ 51. SBC does not believe that a separate performance measure is necessary. Performance measure changes are generally discussed in the performance measure six-month review; one of which is just concluding.

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1. Service Representative Training

SBC developed for Local Service Center (“LSC”) Service Representatives a Service Order Quality informational package⁴ directed at improving service representative order accuracy. The package is similar in form to the Student Guides provided during the training of service representatives involved in producing ACIS service orders. This package provides information such as SBC management’s commitment to quality order processing, the importance of accurate orders, and the impacts of inaccurate orders on CLECs and end-users. The package includes service order examples and a listing of available on-line resources. This package was completed December 31, 2002.

- Starting in January 2003⁵, service representatives will receive training using the Service Order Quality informational package.
 - The training is scheduled to be completed by May 31, 2003 with a majority of targeted Service Representatives trained by March 31, 2003.
 - The intended audience for training is service representatives that produce and process Resale and UNE-P service orders for the ACIS system.
 - Review of the package is accomplished in mandatory training sessions facilitated by SBC’s Training Department. Logs will be maintained to track attendance and manage attendance compliance.
 - A General Manager, Area Manager or Line Manager will address each class with a list of Talk Points to emphasize management’s commitment to this process.

2. CSI Quality Review

- SBC is designing a quality review process for CSI accuracy⁶. This review will rely on sampling UNE-P and Resale production service orders to monitor CSI accuracy⁷.

⁴ See AT&T’s comments filed 11/15/02, Connolly affidavit at pg. 19, ¶ 43. SBC has expanded the detail provided in this compliance plan to address the description of the information contained in the training package as well as its goal, and inclusion of a review of that information package by the third party contractor.

⁵ See AT&T’s comments filed 11/15/02, Connolly affidavit at pg. 20, ¶ 44. SBC has expanded the detail provided in this compliance plan to address specific timeframes for each action item, including component items of each action item.

⁶ See AT&T’s comments filed 11/15/02, Connolly affidavit at pg. 21, ¶ 46. SBC has expanded the detail provided in this compliance plan to address the description of how SBC is designing its quality review process, including sampling, frequency, timing, and how accuracy will be determined, as well as describing the purpose of this type of quality review process. SBC is unable to comment on how the third party may design its sampling plan.

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This mechanism will enable SBC to monitor the effectiveness of its training and help identify potential corrective actions. These quality reviews will be conducted on a frequent, on-going basis. Initially, the reviews are intended to be conducted daily.

- Samples of orders will be pulled based on information in a reporting system called the Local Service Center Decision Support System (DSS), which is a reporting system used by the LSC to track and capture information on order activity.
- The criteria for sampling will include product type and status. Sampled orders will come from pending orders, i.e., orders not yet completed.
- Quality Assurance (“QA”) service representatives, experienced service representatives selected for this purpose, will conduct reviews using Methods and Procedures developed specifically for this process.
- Potential order discrepancies will be reviewed to:
 - Verify that discrepancies are in fact errors;
 - Correct identified errors;
 - Identify root causes of errors;
 - Provide the basis for individual coaching of service representatives.
- The service representatives will compare the CLEC LSR to the corresponding internal service order on a field by field basis. Corrections will be made as necessary prior to order completion.

3. Corrective Actions

- SBC plans to address discrepancies identified during its quality reviews as described above in the following manner:⁸

⁷ See AT&T’s comments filed 11/15/02, Connolly affidavit at pg. 20, ¶ 45 and pg. 22, ¶ 50. During the BearingPoint test, only the UNE-P and Resale product types did not meet BearingPoint’s benchmark. One issue had been identified in relation to unbundled loops during the test; however, that issue was corrected and the correction confirmed by BearingPoint. Thus, it is unnecessary to review all product types.

⁸ See AT&T’s comments filed 11/15/02, Connolly affidavit at pg. 21, ¶ 47 and pp. 19-22, ¶¶ 42, 45, 48, and 49. SBC has recognized that errors have been caused by manual handling of orders; thus, the emphasis on the training package and dissemination of same to LSC service representatives. The quality review process will assure that accuracy improves and will be maintained. SBC has expanded the detail provided in this compliance plan to address the description of how SBC will use the information collected from the quality review process to institute correction of identified errors, provide service representative coaching, as well as to ascertain needed improvements in processes, systems, and/or training.

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- Review results will be documented in a new LSC database to track performance, identify trends, and provide reports for LSC management.
- Information on the errors and root cause(s) identified will be analyzed using tracked data to ascertain if common issues or trends are apparent.
- This information will be used to determine whether individual service representative coaching is needed, or if additional training, changes to processes, methods and procedures and/or systems are needed. SBC will implement appropriate corrective actions as warranted, including additional training and/or changes to processes or systems.

The following table provides the schedule for the actions discussed in this section:

Task	Begin	End	Status
Quality Assurance-Related Tasks			
1. Develop Service Order Quality informational package and provide training to all LSC UNE-P and Resale Service Representatives.	11/15/02	5/31/03	In progress
A. Determine and assign resource to lead "informational package" development effort	11/15/02	12/31/02	Complete
B. Produce "informational package"	12/01/02	12/31/02	Complete
C. Determine training deployment method	12/01/02	01/06/03	Complete
D. Create training schedule or plan	12/01/02	01/14/03	Complete
E. Conduct training	01/15/03	05/31/03	In progress
2. Design and implement a quality review process for validating the accuracy of the ACIS CSI record updates, which includes both sampling and quality reviews Unbundled Network Elements – Platform ("UNE-P") and Resale orders.	12/15/02	Ongoing	In progress
A. Design quality review process	12/15/02	1/31/03	Complete
B. Implement daily quality review of Resale and UNE-P Complex orders	02/03/03	Ongoing	In progress
3. Identify root causes of errors identified by quality review and sampling processes	12/15/02	Ongoing	In progress
A. Develop identification and tracking process	12/15/02	2/5/03	Complete
B. Identify training or other 'correcting' opportunities	02/03/03	Ongoing	In progress
C. Implement corrective actions	02/03/03	Ongoing	In progress

5. Third Party Examination Approach

Upon completion of the above described training program and after an appropriate period of internal quality review as determined by SBC, the accuracy of Customer Service Record updates is expected to improve when compared to BearingPoint's test results of 92% accurate. SBC's target is 95% accuracy. If the third party evaluation does not show the target has been achieved, any further required action will be determined by the MPSC. While the third party selected, BearingPoint, will design its own work program and parameters, SBC anticipates that the third party evaluation will address and include the following:

- The third party will review accuracy of customer service inquiry updates by comparing CSR updates with the local service requests for such activity using a sample from commercial production. The sample design and the evaluation methodology will be reviewed with SBC and with the MPSC staff prior to its implementation.
- The third party will evaluate SBC's implementations of the actions described in this compliance plan by reviewing documents, conducting interviews, and performing site visits. This evaluation will include a review of SBC's quality review results.